

REQUIRED STATEMENT

TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY

All Cases: Debtor(s)

JEANY L. DUNLAP

Case No. 19-08135

Chapter 13

AKA JEANY

FREDERICKSON,

All Cases: Moving Creditor IGLOO SERIES IV TRUST

Date Case Filed 03/22/2019

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe)

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed 6/14/19

Chapter 7: ☐ No-Asset Report Filed on  
☐ No-Asset Report not Filed, Date of Creditors Meeting

1. Collateral

a. ☒ Home

b. ☐ Car Year, Make and Model \_\_\_\_\_

c. ☐ Other (describe) \_\_\_\_\_

2. Balance Owed as of Petition Date \$ 192,410.18 per Claim 5-1

Total of all other Liens against Collateral \$ 0.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in all cases) \$ 175,000.00 per Debtor's Schedule A/B

5. Default

a. ☒ Pre-Petition Default

Number of months 14

Amount \$ 25,904.07

b. ☒ Post-Petition Default

i. ☒ On direct payments to the moving creditor

Number of months 2

Amount \$ 2448.04 (with \$22.79 in  
suspense)

ii. ☐ On payments to the Standing Chapter 13 Trustee

Number of months \_\_\_\_\_

Amount \$ \_\_\_\_\_

6. Other Allegations

a. ☐ Lack of Adequate Protection § 362 (d)(1)

i. ☐ No insurance

ii. ☐ Taxes unpaid

iii. ☐ Rapidly depreciating asset

iv. ☐ Other (describe) \_\_\_\_\_

Amount \$

b. ☐ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)

c. ☐ Other "Cause" § 362 (d)(1)

i. ☐ Bad Faith

ii. ☐ Multiple filings

iii. ☐ Other (describe)

d. Debtor's Statement of Intention regarding the Collateral

i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☐ No Statement of Intention filed

Date: 8/21/2019

/s/ Timothy R. Yueill

Submitted By